Colorado Department of Health

Hazardous Materials & Waste Management Division

Comments

on

DRAFT

TECHNICAL MEMORANDUM NO. 1

INDUSTRIAL AREA

SURFACE WATER AND SEDIMENT

FIELD SAMPLING PLAN

ADDENDUM TO PHASE I

RFI/RI WORK PLAN

(OPERABLE UNIT NO. 12)

OCTOBER, 1994

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SPECIFIC COMMENTS:

Section 2.1.2: Surface water station SW059 is discussed in detail but is not shown on any figure or plate. Please show SW059, SW056, SW060 and SW061 on a figure or plate.

Section 4.1: On Plate 2 please delineate and identify the seven primary drainage basins.

Section 4.1.3: Drainage Basin 3 more specifically drains the northwest portion of the Industrial Area and covers less than 50% of the Protected Area (PA). Drainage Basins 2, 6 and 7 combined cover a greater portion of the PA. (The significance of the relationship of the PA and the drainage basin is not apparent.)

Section 4.1.7: Ground water flow from DB7 is currently treated in Building 374 with the evaporators of Building 910 serving as a backup.

Section 4.2: On page 12 the statement is made that EG&G quarterly monitoring activities have DQOs consistent with the proposed surface water sampling program. It is inferred by the Division that the high and low flow event monitoring will be more opportunistic than pre-established quarterly monitoring efforts. Will reliance on the quarterly efforts provide sampling in conjunction with a sustained spring thaw as proposed for the high water event?

Relative to the statement on page 13 that OU13 sampling (in Central Ave. Ditch) may possibly be incorporated into this effort, the Division believes that proposed OU-13 activities should be specifically incorporated into this FSP to meet the overall objectives of this plan. If the industrialized area is to become a integrated investigation then integrate now not later.

Also on page 13, last paragraph, the statement is made that surface waters will be sampled at foundation drain outfalls to support the objectives of the FSP. Plate 2 shows only occasional surface water sampling stations that coincide with foundation drain sample stations. By example, a review of Plate 2 and the foundation drain FSP (OU-8 TM-1) shows station 3-23 which coincides with foundation drain sampling station FD 516-1 (OU-8, TM-1, Figure 8). However other proposed foundation drain stations southeast of Building 374 (FD-371-2, OU-8, TM-1, Fig. 7) and northwest of Building 771 (FD-771-5, OU-8, TM-1, Fig. 11) are not shown. In order to determine the adequacy of an integrated FSP, the Division needs to see a map depicting all sampling stations that will be used to meet objectives.

Additionally, the sparsity of surface water stations shown on Plate 2 suggest that the objective of characterizing nature and extent of contamination and to support the subsequent objectives (e.g. risk assessment) are inadequate. As a further example, why were stations 1-6 and 1-26 the only surface water stations (Plate 2) selected within Drainage Basin 1? A more detailed rationale is needed to demonstrate how the objectives will be met.

Plate 2: Subbasins CWAC8 (solar ponds) in DB7 and CWADIV2 in DB4 are not shown, please add.